

Hammargren, Laura

From: Ross, Nancy
Sent: Tuesday, June 28, 2016 10:27 AM
To: ekhan@trinityhealthcarenetwork.com
Cc: Hammargren, Laura; Kelley, Charles S.
Subject: Red Oak hospital vs. AT&T, Inc.; Civil Action No. 4:16-cv-01542

Dear Mr. Khan:

As I stated yesterday in our short call, I am representing AT&T and associated defendants in the lawsuit you have recently filed in federal court in Houston. As I mentioned in our call, your lawsuit names the wrong plan for the claim alleged, as well as an AT&T entity and individual who are not the plan administrator nor proper defendants. Hence, as an initial matter, if you intend to proceed with your claim, you will need to amend the complaint and serve a new waiver of service. Upon receipt of a waiver of service directed to my attention, I will agree to the waiver. Please note that in bringing the errors in your current complaint to your attention, my clients are not admitting that any AT&T entity, affiliate or employee is a proper party to your lawsuit, or that your client has standing to bring this lawsuit. We are simply informing you of your mistake in an effort to save both parties the time and expense of a motion to dismiss.

Please let me today if you intend to amend and serve your complaint.

Thank you. Nancy

Nancy G. Ross

Partner

Mayer Brown LLP

71 South Wacker Drive

Chicago, IL 60606

Direct 312-701-8788

nross@mayerbrown.com

[Professional Bio](#)

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